

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
JAN 28 2025
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

TERRY FOSTER
1011 EAST 71ST STREET
CLEVELAND, OH 44103
Plaintiff(s) et. al

V.

GRAY LOCAL MEDIA, INC
4370 PEACHTREE ROAD N.E. STE 400
ATLANTA, GA 30319
Defendant(s) et. al

CASE NO. **1:25 CV 00139**

JUDGE: **JUDGE BRENNAN**
MAG JUDGE ARMSTRONG

CIVIL COMPLAINT

JURY TRIAL DEMANDED

Now comes the Plaintiff(s), Terry Foster, by and through his Civil Complaint, and Respectfully Moves the Honorable Court, pursuant to the Federal Civil Rule of Procedure 7(a)(1) for an Order for damages against the Defendant(s), Gray Local Media, Inc., due to there Negligent; Defamation of Character; Libel; and Slander; from a false news story broadcasting. A Memorandum in Support of this Civil Complaint is attached hereto.

Respectfully Submitted,



Terry Foster
1011 E. 71st Street
Cleveland, OH 44103

MEMORANDUM

1. On or about the 22th day of November, 2021, News station 19 News, which is broadcast on television station WOIO & WUAB-TV stations owned by Gray Local Media, Inc. hereafter “Defendant(s)”; received false information from the Cleveland Police Department, hereafter “CPD”; that the Plaintiff had shot an unarmed woman from his car window.
2. This information was a totally false accusation for which 19 News never fact check the information before they broadcast Plaintiff name, face, and any or all pertinent private information on their news reporting platforms; which is television, internet, and any other outlets for which the Defendant(s) owns.
3. The Defamation and Slander of Plaintiff character was harmed to the highest extent you can reach; due to the thousands to millions of viewers that the Defendant(s) news platforms can broadcast out to, without no fact checking to verify that the accusations were true.
4. Plaintiff life has been in danger due to such false carelessness national to international news broadcast. Plaintiff family members from his, but not limited to his (i.e.) Mother; Sisters; Daughters; Son; Grandchildren; Nieces; Nephews; even his extended family members which are Cousins; Stepchildren, and beyond has suffer death threats harm and acts of violent physical attacks from such media news broadcast negligence, off of an invalid false accusation generated by the CPD to the news station.
5. The CPD, new that the information against the Plaintiff was false when they further investigated, which showed that the Plaintiff did not participate in no crime. Thereafter, the CPD switched their false narrative to one of Plaintiff’s alleged girlfriends just to keep another false narrative going; just to wrongfully convict the Plaintiff, and one of his alleged girlfriend as the offenders, well after they gave 19 News false information about the Plaintiff(s).
6. Plaintiff spent over 3 years in jail, for which came from 15 ½ months in the Cuyahoga County Jail, and 20 ½ plus months in the Ohio Department of Corrections & Rehabilitation. Plaintiff then girlfriend also spent nearly 3 years in jail under the same false pretenses. Before such false case was vacated off both of them by the 8th District Court of Appeals, due to Insufficient False Evidence, from a Reckless Investigation from the CPD.
7. The press is not free to publish with impunity everything and anything it desires to publish. Although it may deter or regulate what is said or published, the press may not circulate knowing or reckless falsehoods damaging to private reputation without

subjecting itself to liability for damages, including punitive damages, or even criminal prosecution. A newspaper, news-station or a journalist may also be punished for contempt of court, in appropriate circumstances.

8. Freedom of Speech, Free Press: The 1st Amendment does not guarantee the press a constitutional right of special access to information not available to the public generally. Newsmen nor News Stations have no Constitutional right of access to the scenes of crime or disaster when the general public is excluded, and they may be prohibited from attending or publishing information about trials if such restrictions are necessary to assure a defendant a fair trial before an impartial tribunal, from libel and slander.
9. The publisher of a newspaper, or an owner of a news-station, has no special immunity from the application of general laws. News outlets has no special privilege to invade the rights and liberties of others. Branzburg v. Hayes, 408 U.S. 665
10. Plaintiff damages are irreversible from the false reporting of Defendant(s) broadcast through their media news platforms.
11. Plaintiff, has endured pain and suffering; emotional & physical distress; mental anguish; economical losses; loss of liberty and discrimination harm, from the flagrant violation news media broadcast due to the Defendant's news broadcasting staff at WOIO & WUAB-TV, in Cleveland, Ohio, and any shared networks that affiliated with the Defendant(s).
12. The only remedy of recourse the Plaintiff has is this civil complaint that will allow the Plaintiff to stop the everyday threats and pain which he and his family endures throughout the days, weeks, and years, Plaintiff has suffered.
13. Plaintiff, also ask this honorable court for an injunction to have Defendant's news staff to refrain from doing any further harm to Plaintiff(s), and publish a retraction-correction of the false statement to the false news story ran on their media platforms.
14. Plaintiff also request Defendant to pay attorney fees and court cost.
15. Plaintiff, will entertain all mediation and settlement negotiations.

(WHEREFORE) Plaintiff(s) demands compensatory and punitive prayer damage against the Defendant(s) in the amount for the sum of \$415, 000,000.

CERTIFICATE OF SERVICE

The undersigned Plaintiff hereby submits that true and accurate copy of the foregoing Civil Complaint was forward to the Office of the Clerk, United State District Court, 801 W. Superior Avenue, Cleveland, OH 44113-1830 to be served upon the Defendant(s) Gray Local Media, Inc. 4370 Peachtree Road N.E. Ste. 400, Atlanta, GA 30319 and to be placed into the electronic filing system to be serve upon the Court, and all parties involve.


Terry Foster, Plaintiff(s)